

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

PAUL CREARY,
TARELLE JONES,
CURLENE REID,
a/k/a "Curlene Manswell,"
TIMOTHY JONES,
RAYMOND WAINWRIGHT,
a/k/a "Scott Hall," and
VERE JOSEPH,
a/k/a "Obie,"

Defendants.

INDICTMENT

S2 04 Cr. 971 (WHP)

COUNT ONE

The Grand Jury charges:

1. From in or about May 2000, up to and including in or about August 2004, in the Southern District of New York and elsewhere, PAUL CREARY, TARELLE JONES, CURLENE REID, a/k/a "Curlene Manswell," TIMOTHY JONES, RAYMOND WAINWRIGHT, a/k/a "Scott Hall," and VERE JOSEPH, a/k/a "Obie," the defendants, together with others known and unknown, unlawfully, willfully, and knowingly, did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code, Sections 1028(a)(1) and (a)(2).

2. It was a part and an object of the conspiracy that PAUL CREARY, TARELLE JONES, CURLENE REID, a/k/a "Curlene Manswell,"

TIMOTHY JONES, RAYMOND WAINWRIGHT, a/k/a "Scott Hall," and VERE JOSEPH, a/k/a "Obie," the defendants, together with others known and unknown, unlawfully, willfully, and knowingly, and without lawful authority, would and did produce an identification document, authentication feature, and false identification document, some of which appear to be issued by or under the authority of the United States, in a circumstance in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1028(a)(1).

3. It was further a part and an object of the conspiracy that PAUL CREARY, TARELLE JONES, CURLENE REID, a/k/a "Curlene Manswell," TIMOTHY JONES, RAYMOND WAINWRIGHT, a/k/a "Scott Hall," and VERE JOSEPH, a/k/a "Obie," the defendants, and others known and unknown, unlawfully, willfully, and knowingly, would and did, transfer an identification document, authentication feature, and false identification document, knowing that such document and feature was stolen and produced without lawful authority, some of which appear to be issued by or under the authority of the United States, in a circumstance in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1028(a)(2).

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts were committed in the Southern District of New York and elsewhere:

a. In or about October 2003, in Bronx, New York, CURLENE REID, a/k/a "Curlene Manswell," the defendant, arranged a meeting for a cooperating witness ("CW-1") to obtain fraudulent documents.

b. On or about November 17, 2003, in Bronx, New York, PAUL CREARY, the defendant, discussed with a confidential informant ("CI-1") selling a fraudulent United States driver's license, a fraudulent birth certificate, and a fraudulent Social Security card.

c. On or about December 8, 2003, in Bronx, New York, PAUL CREARY, the defendant, accepted \$1500 from CI-1 as payment for a fraudulent United States driver's licence, birth certificate, and Social Security card.

d. On or about December 12, 2003, in Bronx, New York, PAUL CREARY, the defendant, delivered a fraudulent Michigan birth certificate, a fraudulent Connecticut driver's license, and a fraudulent Social Security card to CI-1.

E. On or about April 22, 2004, TARELLE JONES, the defendant, called PAUL CREARY, the defendant, to discuss payment for fraudulent documents.


F. On or about June 5, 2004, TIMOTHY JONES, the defendant, left a voice message for PAUL CREARY, the defendant, regarding fraudulent documents.

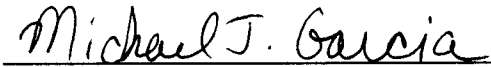
G. On or about May 6, 2004, RAYMOND WAINWRIGHT, a/k/a "Scott Hall," the defendant, called PAUL CREARY, the

defendant, and discussed materials used to produce fraudulent documents.

H. On or about June 4, 2004, VERE JOSEPH, a/k/a "Obie," the defendant, called PAUL CREARY, the defendant, and discussed an order for fraudulent documents.

(Title 18, United States Code, Section 1028(f).)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(Title 18, United States Code, Section 1028(f).)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL



Foreperson.

10/19/05
 Supersedeas filed (S2)
